UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN

MELISSA MCCABE

Plaintiff,

Case No. 2:24-cv-1005

v.

SARATI INTERNATIONAL INC

Defendant.

DEFENDANT SARATI INTERNATIONAL INC'S CIVIL L. R. 7(H) EXPEDITED NON-DISPOSITIVE UNOPPOSED MOTION TO EXTEND DEADLINES

Defendant Sarati International Inc, through its counsel, moves the court for an expedited ruling pursuant to Civil L.R. 7(h) and Fed. R. Civ. P. 6(b)(1)(A) for an extension of the deadline for the filing of Defendants answer in this matter based on the following:

- The Defendant was served with the Summons and Complaint in this matter on August 30, 2024;
- 2. The Defendant's Answer to the Complaint is due on September 20, 2024;
- 3. There has been insufficient time for newly retained counsel to investigate this matter to the extent necessary to fully respond to the Complaint;
- 4. This is the first request for a deadline extension in this matter, it is not prejudicial to Plaintiff, and it will not affect the orderly administration of the case; and
- 5. Plaintiff does not oppose this motion and Plaintiff's counsel has granted permission to make that assertion in this motion.

For these reasons, it is respectfully requested that the deadline for all Defendant's pleadings responsive to the Complaint be extended by thirty days until October 21, 2024.

Dated this 16th day of September, 2024.

MWH LAW GROUP LLP

By: s/Emery K. Harlan

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